



**West
Midlands
Metro**

Midland Metro Limited Applicant Privacy Notice

Midland Metro Limited is the “data controller” and the HR Department will manage the overall recruitment process for MML. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with MML (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

What are the data protection principles that we comply with?

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

What is the kind of information we hold about you?

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and other information that you have provided to support your application
- Any information you provide to us during an interview.
- Any test results that maybe used as part of the recruitment process

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about applicants from the following sources:

- You, the applicant.
- From the relevant recruitment agency, from which we collect the following categories of data including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and other information that you have provided to support your job search or application.
- Disclosure and Barring Service (DBS) or Disclosure North in respect of criminal convictions.
- Your named referees, from whom we collect the following categories of data including your job history, your performance in previous roles, your previous remuneration packages and your reasons for leaving previous roles.
- DLVA Licence verifications
- Publicly accessible third-party websites such as LinkedIn

How we will use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our recruitment processes.
- Comply with legal or regulatory requirements.
- Monitor equal opportunities

Most of the personal data that we collect, and process is needed to enable us to pursue our legitimate interests which are to facilitate our recruitment process, assess your suitability to work with us and to decide whether to enter into a contract of employment with you.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

What happens if you fail to provide personal information?

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information?

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use information relating to your health to consider whether you are capable to undertake the role that you have applied for and whether additional support will be needed to help you do the role.
PLEASE NOTE – we will not decide on your suitability for a role based on any health information you provide.

What about information on criminal convictions?

For certain roles, we may process information about criminal convictions. The purpose of this information is for us to carry out a background check to enable us to safeguard children and vulnerable adults for whom our employees may encounter through our various contracts.

For certain roles, we are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which may make you unsuitable for such a role.

We have in place an appropriate policy document (Disclosure and Barring Services Policy) and safeguards which we are required by law to maintain when processing such data.

Automated decision making

We do not make decision that will have a significant impact on you solely based on automated decision making.

We do have a legal requirement to ensure you have a Right to Work in the UK, therefore, your application is not able to proceed if you are not eligible to work within the UK.

Data sharing

Why might you share my personal information with third parties?

MML is required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business requirement to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures are available upon request.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of up to 13 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with Data Protection policy and procedure.

If you have consented to us processing and sharing your personal information for the purpose of identifying other employment opportunities within MML, we will retain your personal information for a period of 13 months which will be confirmed to you at the time when you consented to us processing your personal information for this specific purpose.

Rights of access, correction, erasure, and restriction

What are your rights in connection with personal information?

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email info@westmidlandsmetro.com

Right to withdraw consent

When you applied for this role, you provided consent on a specific date to us processing your personal information for the purposes of considering you for other employment opportunities that may arise within MML. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please email info@westmidlandsmetro.com

Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for this purpose and, subject to our retention policy, we will dispose of your personal data securely.

Data Privacy Officer

We have appointed a Data Privacy Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Officer via email on confidential@westmidlandsmetro.com

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.